

# Rickner PLLC

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July 7, 2025

**Via ECF**

Hon. Sarah L. Cave  
U.S. Magistrate Judge  
Chambers Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 18A  
New York, NY 10007

Re: *Carmelo Castillo v. The City Of New York*, Case 24-CV-09453-VSB-SLC

Dear Judge Cave:

We represent Plaintiff in the above-captioned action and respectfully write to request a thirty (30) day extension of the deadline to complete ESI protocol. The current deadline is Monday, July 7, 2025, therefore, we request an extension to Wednesday, August 6, 2025.

This is Plaintiff's first request for an extension of this deadline. A Proposed Revised Case Management Plan is attached hereto as Exhibit A.

The parties have had initial discussions regarding ESI and Plaintiff has indicated who we believe are the relevant custodians, databases, and repositories in the instant matter. However, Defendant's counsel, Ms. Apfel, was unavailable last week and the Fourth of July holiday has made it difficult for the parties to meet the July 7, 2025 deadline. The parties are planning to meet and confer early this week and are optimistic that it will not take the entire thirty-day extension to create the protocol.

Additionally, the parties have already exchanged initial discovery requests and do not anticipate the extension of the ESI protocol deadline will impact any of the other deadlines in this case. For these reasons, we respectfully request a thirty-day extension to the ESI protocol deadline.

Defendant has consented to the instant request.

We thank the Court for its time and attention to this request.

Respectfully,

/s/

Sara Wolkensdorfer

Plaintiff's request at ECF No. 19 is GRANTED. Plaintiff's proposed revised Case Management Plan at ECF No. 19-1 is ADOPTED.

The Clerk of the Court is respectfully directed to close ECF No. 19.

SO ORDERED 7/8/25

  
SARAH L. CAVE  
United States Magistrate Judge